

K&L GATES

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Honorable Margaret M. Garnett  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 906  
New York, NY 10007

**Re: Absolute Resolutions Investments, LLC v. Citibank, N.A., No. 22-cv-2079-MMG**

Your Honor:

Plaintiff Absolute Resolutions Investments, LLC (“Absolute”) and Citibank, N.A. (“Citi”) (together, the “Parties”) respectfully submit this joint request for a brief extension of time, until **Thursday, April 25, 2024**, to submit their discovery protocol.

As it currently stands, both Parties have been diligently working on the protocol and have met and conferred twice regarding the same. However, the Parties agree that additional time is needed to properly confer with their respective e-discovery teams and clients. Additionally, a member of counsel has been dealing with an urgent medical issue over the past week, which has also contributed to this delay. The Parties do not anticipate any disputes over the content of the protocol, and this extension will not impact any other deadlines in this matter.

The Parties thank the Court for its consideration of this request.

Very truly yours,

*/s/ Phoebe S Winder*

Phoebe S Winder  
Partner